

**EXHIBIT 3**

**From:** Christopher R. Dyess <cdyess@schlamstone.com>  
**Sent:** Friday, December 10, 2021 11:01 AM  
**To:** Leonard, Claire  
**Subject:** RE: [external email:] IKB International v Wells Fargo

The deadline for 3<sup>rd</sup> party discovery in all the cases (US Bank and Wells included) is May 20, 2022.

Main: 212 344-5400  
Direct: 212 612-0691  
[cdyess@schlamstone.com](mailto:cdyess@schlamstone.com)



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**From:** Leonard, Claire <claire.hallowell@lehmanholdings.com>  
**Sent:** Friday, December 10, 2021 12:56 PM  
**To:** Christopher R. Dyess <cdyess@schlamstone.com>  
**Subject:** RE: [external email:] IKB International v Wells Fargo

Ok, could you also let me know what the deadline is for discovery in the US Bank case? I understand it is May 30, 2022 for the Wells Fargo one.

Thanks,  
Claire

Claire Leonard  
Lehman Brothers Holdings Inc.  
[Claire.Leonard@lehmanholdings.com](mailto:Claire.Leonard@lehmanholdings.com)  
+1 (646) 285-9361

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**From:** Christopher R. Dyess <[cdyess@schlamstone.com](mailto:cdyess@schlamstone.com)>  
**Sent:** Friday, December 10, 2021 12:54 PM  
**To:** Leonard, Claire <[claire.hallowell@lehmanholdings.com](mailto:claire.hallowell@lehmanholdings.com)>  
**Subject:** RE: [external email:] IKB International v Wells Fargo

I am. My understanding is the below trusts relate to all of the cases we are working on. Let me confirm.

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[cdyess@schlamstone.com](mailto:cdyess@schlamstone.com)



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**From:** Leonard, Claire <[claire.hallowell@lehmanholdings.com](mailto:claire.hallowell@lehmanholdings.com)>

**Sent:** Friday, December 10, 2021 12:51 PM

**To:** Christopher R. Dyess <[cdyess@schlamstone.com](mailto:cdyess@schlamstone.com)>

**Subject:** RE: [external email:] IKB International v Wells Fargo

Thanks Chris.

I had also reached out to Niall on subpoeans related to the IKB v. US Bank case. Are you also involved with this?

Claire Leonard

Lehman Brothers Holdings Inc.

[Clare.Leonard@lehmanholdings.com](mailto:Clare.Leonard@lehmanholdings.com)

+1 (646) 285-9361

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**From:** Christopher R. Dyess <[cdyess@schlamstone.com](mailto:cdyess@schlamstone.com)>

**Sent:** Friday, December 3, 2021 3:52 PM

**To:** Leonard, Claire <[claire.hallowell@lehmanholdings.com](mailto:claire.hallowell@lehmanholdings.com)>

**Cc:** David J. Goldsmith <[dgoldsmith@schlamstone.com](mailto:dgoldsmith@schlamstone.com)>

**Subject:** RE: [external email:] IKB International v Wells Fargo

Hello Claire,

Here are the trusts and the associated entities.

Have a nice weekend.

Chris

SASC 2002-AL1	Lehman Capital & Lehman Brothers Bank, FSB
FFML 2005-FFH2 SARM 2006-5	Lehman Brothers Holdings, Inc.
SARM 2006-5	Lehman Brothers Bank
FFML 2005-FFH3	Aurora Loan Services, LLC
SASC 2002-AL1	Aurora Loan Services, LLC

BAYV 2006-A  
FFML 2005-FFH2  
SARM 2006-5  
SASC 2005-GEL1  
SASC 2005-WF4  
SASC 2006-EQ1A  
SASC 2006-WF2  
SASC 2006-WF3

Aurora Loan Services, LLC

Main: 212 344-5400  
Direct: 212 612-0691  
[cdyess@schlamstone.com](mailto:cdyess@schlamstone.com)



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**From:** Leonard, Claire <[claire.hallowell@lehmanholdings.com](mailto:claire.hallowell@lehmanholdings.com)>  
**Sent:** Thursday, December 2, 2021 11:25 AM  
**To:** Christopher R. Dyess <[cdyess@schlamstone.com](mailto:cdyess@schlamstone.com)>  
**Cc:** David J. Goldsmith <[dgoldsmith@schlamstone.com](mailto:dgoldsmith@schlamstone.com)>  
**Subject:** RE: [external email:] IKB International v Wells Fargo

Great, appreciate it.

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**From:** Christopher R. Dyess [<mailto:cdyess@schlamstone.com>]  
**Sent:** Wednesday, December 01, 2021 12:01 PM  
**To:** Leonard, Claire  
**Cc:** David J. Goldsmith  
**Subject:** RE: [external email:] IKB International v Wells Fargo

I will try to get you a list. I will need to have a paralegal pull the info.

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Direct: 212 612-0691  
[cdyess@schlamstone.com](mailto:cdyess@schlamstone.com)



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**From:** Leonard, Claire <[claire.hallowell@lehmanholdings.com](mailto:claire.hallowell@lehmanholdings.com)>

**Sent:** Wednesday, December 1, 2021 12:00 PM

**To:** Christopher R. Dyess <[cdyess@schlamstone.com](mailto:cdyess@schlamstone.com)>

**Cc:** David J. Goldsmith <[dgoldsmith@schlamstone.com](mailto:dgoldsmith@schlamstone.com)>

**Subject:** RE: [external email:] IKB International v Wells Fargo

I do but I imagine you have a single consolidated list somewhere?

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**From:** Christopher R. Dyess [<mailto:cdyess@schlamstone.com>]

**Sent:** Wednesday, December 01, 2021 11:58 AM

**To:** Leonard, Claire

**Cc:** David J. Goldsmith

**Subject:** RE: [external email:] IKB International v Wells Fargo

I believe they are identified in the subpoenas we sent. Do you not have the subpoenas?

Main: 212 344-5400

Direct: 212 612-0691

[cdyess@schlamstone.com](mailto:cdyess@schlamstone.com)



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**From:** Leonard, Claire <[claire.hallowell@lehmanholdings.com](mailto:claire.hallowell@lehmanholdings.com)>

**Sent:** Wednesday, December 1, 2021 11:54 AM

**To:** Christopher R. Dyess <[cdyess@schlamstone.com](mailto:cdyess@schlamstone.com)>

**Cc:** David J. Goldsmith <[dgoldsmith@schlamstone.com](mailto:dgoldsmith@schlamstone.com)>

**Subject:** RE: [external email:] IKB International v Wells Fargo

Thanks Chris. Could you also please identify the trusts at issue?

Claire

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**From:** Christopher R. Dyess [<mailto:cdyess@schlamstone.com>]

**Sent:** Wednesday, December 01, 2021 11:48 AM

**To:** Leonard, Claire

**Cc:** David J. Goldsmith

**Subject:** RE: [external email:] IKB International v Wells Fargo

Thanks for the call, Claire,

As discussed, I am putting this email together to summarize what we discussed.

For the subpoenas issued to the Lehman and Aurora entities, we have cut back the documents we are seeking to three categories. First, we would like all of the underwriting guidelines for the loans in the trusts at issue. Second, we are seeking the loan files for those trusts. As I mentioned, our expert is going to do some work early next year to identify the specific loans we would like loan files for. I understand that you are in the middle of a liquidation so to the extent you need to, please preserve the loan files for the loans until our expert can complete their work.

Finally, we are also seeking the loan tapes for the underlying loans to the extent we are not able to get these from another source.

As discussed, if you could provide us with itemized cost estimates for producing these documents, please do so and we will run it by the client to get approval. As I mentioned, there are some costs the client is willing to pay and others they are not and it is best that we iron out those issues before you start producing documents.

Chris

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Direct: 212 612-0691  
[cdyess@schlamstone.com](mailto:cdyess@schlamstone.com)



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**From:** Leonard, Claire <[claire.hallowell@lehmanholdings.com](mailto:claire.hallowell@lehmanholdings.com)>  
**Sent:** Wednesday, December 1, 2021 11:33 AM  
**To:** Christopher R. Dyess <[cdyess@schlamstone.com](mailto:cdyess@schlamstone.com)>; Christopher R. Dyess <[cdyess@schlamstone.com](mailto:cdyess@schlamstone.com)>; Leonard, Claire <[claire.hallowell@lehmanholdings.com](mailto:claire.hallowell@lehmanholdings.com)>  
**Cc:** David J. Goldsmith <[dgoldsmith@schlamstone.com](mailto:dgoldsmith@schlamstone.com)>  
**Subject:** RE: [external email:] IKB International v Wells Fargo

Hi Chris,

I am not able to log in – it says my “input is invalid” after I enter the access code.

You can call me directly on 610-547-4931 if that's easier.

Claire

-----Original Appointment-----

**From:** Christopher R. Dyess [<mailto:cdyess@schlamstone.com>]  
**Sent:** Tuesday, November 23, 2021 1:22 PM  
**To:** Christopher R. Dyess; Leonard, Claire  
**Cc:** David J. Goldsmith  
**Subject:** [external email:] IKB International v Wells Fargo  
**When:** Wednesday, December 01, 2021 11:30 AM-12:00 PM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** (646) 923-8100; Access: 914-466-895

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**From:** Leonard, Claire <[claire.hallowell@lehmanholdings.com](mailto:claire.hallowell@lehmanholdings.com)>  
**Sent:** Tuesday, November 23, 2021 1:09 PM  
**To:** Christopher R. Dyess <[cdyess@schlamstone.com](mailto:cdyess@schlamstone.com)>  
**Cc:** David J. Goldsmith <[dgoldsmith@schlamstone.com](mailto:dgoldsmith@schlamstone.com)>  
**Subject:** RE: [external email:] RE: IKB International v Wells Fargo

Thanks Chris.

Tomorrow is difficult for me – lets try after the holiday. Im pretty free Wednesday the 1<sup>st</sup> or the morning of the 2<sup>nd</sup>.

Thanks & happy Thanksgiving

Claire

**From:** Christopher R. Dyess [<mailto:cdyess@schlamstone.com>]  
**Sent:** Tuesday, November 23, 2021 7:55 AM  
**To:** Leonard, Claire  
**Cc:** David J. Goldsmith  
**Subject:** [external email:] RE: IKB International v Wells Fargo

Good morning Claire,

Let me know a good time to speak. I am tied up today, but can talk tomorrow through the early afternoon and then next week after the holiday.

Chris

Main: 212 344-5400

Direct: 212 612-0691

[cdyess@schlamstone.com](mailto:cdyess@schlamstone.com)

<cid:image001.png@01D7E06C.FE7BB950>

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**From:** Seth D. Allen  
**Sent:** Monday, November 22, 2021 11:46 AM  
**To:** Leonard, Claire <[claire.hallowell@lehmanholdings.com](mailto:claire.hallowell@lehmanholdings.com)>  
**Cc:** Christopher R. Dyess <[cdyess@schlamstone.com](mailto:cdyess@schlamstone.com)>  
**Subject:** RE: IKB International v Wells Fargo

Claire- Thanks for reaching out. My colleague, Chris (copied here) will be in touch in the next couple of days. Thanks.

Best,

Seth

**From:** Leonard, Claire <[claire.hallowell@lehmanholdings.com](mailto:claire.hallowell@lehmanholdings.com)>  
**Sent:** Monday, November 22, 2021 11:04 AM  
**To:** Seth D. Allen <[sallen@schlamstone.com](mailto:sallen@schlamstone.com)>  
**Subject:** IKB International v Wells Fargo

Seth,

I hope you are well. I am in receipt of subpoenas sent to Lehman Brothers Holdings Inc. and Aurora in the above-referenced case. I had emailed Niall O'Murchada on these and never received a response. The defendant's attorney, Brian Morgan, also sent subpoenas for the information and suggested I get in touch with you.

As I said to Brian, we are a liquidating bankruptcy estate and while I understand there may not be a ton of time pressure on your side, I would like to make sure we can get the information to you in a timely manner, especially given our limited resources. We will need to be reimbursed for costs in searching for the documents and it probably makes sense for both parties to coordinate that so there isn't a duplication of efforts or expenses. Please let me know how you'd like to proceed.

Thank you,

Claire Leonard

Claire Leonard

Lehman Brothers Holdings Inc.

110 East 42<sup>nd</sup> Street, Suite 820-8<sup>th</sup> Floor

New York, NY 10017

(646) 285-9361

(610) 547 – 4931 (mobile)

[Claire.Leonard@lehmanholdings.com](mailto:Claire.Leonard@lehmanholdings.com)

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